



Harima Global Business Code of Conduct

The policies set forth herein constitute the Global Code of Business Conduct (herein the "Business Code") for all Harima Chemicals Group entities (herein collectively "Harima") and their directors, officers and employees to abide by in conducting its business in accordance with Harima Philosophy.

In this Business Code, the term "We" refers all Harima Chemicals Group entities and their directors, officers and employees (both full time and non-full time).

We are committed to fulfilling our social responsibilities with the highest ethical standards to create a sustainable society by understanding the essence of the Business Code, and respecting human rights, international laws and regulations as well as local laws and regulations within each particular country.

We are aware, however, that this Business Code cannot address every situation that we may encounter, such as day-by-day performance of our duties, or complying with all the local laws and regulations within a particular country. Thus, this Business Code may be supplemented and refined at the local or regional level, whether with local or regional codes or policies, provided that such supplementation shall not include any provisions that conflict with or infringe upon the Business Code.

All the directors and officers of Harima shall recognize that enforcing the Business Code is an integral part of their responsibilities, set an example for others to follow, also ensure that the Business Code is to be fully understood and carried out by every employee, and organize management systems to keep the Business Code updated. All the directors and officers are responsible for resolving any problems arising from any infractions to the Business Code, investigating their causes, implementing all necessary improvements, and ensuring that all measures are taken to prevent any future infractions.

1. R&D for the creation of a prosperous society

Based on our mission of living a better life with what nature provides, we will aim to contribute to the creation of a prosperous society by conducting research and development that foster the harmony between people and technology.

2. Excellence and safety in the products

We manufacture and provide products that are excellent in quality and of great benefit to society, and we ensure that product safety prevails in all aspects of our business activities.

3. Fair trade

In our purchasing and marketing activities, we approach all our transactions fairly and sincerely, and we set and abide by equitable and reasonable terms and conditions of transactions. We do not engage in actions that deviate from sound business practice or social norms.

4. Respect intellectual property right and company property

We recognize the importance of protecting intellectual property including trade secrets.

We protect and defend our own rights while equally respecting the rights of others.

We protect the company resources and information, using them only for conducting our own business activities, without subjecting them to personal use.

5. Co-existence with earth environment

We proactively work towards improving the state of the global environment by appreciating and respecting our natural resources, especially energy and raw materials used for our business activities, on which Harima business depends,.

6. Fair public disclosure of information

By maintaining an open dialogue with our shareholders and with society as a whole, we make every effort to fairly publicize information of social value (including financial information), and we strive to gain people's trust as a highly transparent business.

We comply with laws and regulations that prohibit insider trading of securities.

7. Contribution to society

We contribute to society not only through our business activities, but we also support and participate in charitable and cultural/educational activities that are of benefit to society as a good corporate citizen.

8. Legal compliance and business ethics

In all the areas we do business globally, we abide by all laws and other society rules relating to business activity of each country by conducting ourselves in an open and fair manner. We also maintain sound relationships with governments and administrative bodies, and we refrain from any activity that may disrupt public order or morals, such as dealing with individuals or organizations that have a detrimental effect on the well-being of society or business.

We also refrain from any personal involvement that might conflict with the company's interests or with our responsibilities in the company.

9. Respect diversity of international culture and business practice

In our business activities in global markets, we abide by all international laws and regulations, respect local customs and cultures, and actively contribute to the development of nations and regions where we carry out our business by working closely with all Harima entities.

10. Personal respect

We respect each employee's diversity, individuality, and differences, and strive to provide a relaxed and rewarding working environment for everyone. We also strive to ensure that all our employees are able to work in safety and peace.

[Supplement]

1. We vow to always make every effort to comply with the Business Code. Any of us found to have violated the Business Code will be subject to disciplinary action which may include severe consequences in accordance with applicable laws and regulations as well as company policies and work regulations.
2. Any revision to or abolition of the Business Code shall be subject to the approval of a resolution by the Board of Directors of Harima Chemicals Group, Inc.